

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications  
and Energy on its own motion pursuant to G.L. c. 159,  
§§ 12 and 16, into Verizon New England Inc., d/b/a  
Verizon Massachusetts' provision of Special Access  
Services.  
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**D.T.E. 01-34**

**VERIZON MASSACHUSETTS'  
FIRST SET OF INFORMATION REQUESTS TO WORLDCOM, INC.**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that WorldCom ("WorldCom" or "Respondent") respond to the following information requests addressed to it or its witnesses. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if WorldCom or its witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If WorldCom feels that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

**DEFINITION AND INSTRUCTIONS**

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, "WorldCom" means WorldCom and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-

employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. “Verizon” means Verizon New England, Inc. d/b/a Verizon Massachusetts.

4. The terms “document” and “documentation” are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, workpapers, pamphlets, plans, specifications, summaries, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. “Document” and “documentation” shall also mean copies of documents, notwithstanding that the originals thereof are not in the Respondent’s possession, custody or control, and all attachments to any document. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of “documents” which are to be identified shall include the documents that do exist

6. If WorldCom cannot answer a request in full, please answer to the extent possible and state why the request cannot be fully answered.

7. If the WorldCom refuses to respond to any request by reason of a claim of privilege, please state the privilege claimed and the facts relied upon to support the claim of privilege.

8. Please serve a copy of the responses to these requests on Verizon MA’s attorney, Barbara Anne Sousa, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585, and Verizon’s Legal Specialist, Barbara Landry, 125 High Street, 11<sup>th</sup> Floor, Boston, Massachusetts 02110. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

## **INFORMATION REQUESTS**

- 1-1 Please provide all Verizon order numbers and Verizon circuit identifier numbers relating to the orders from Bloomberg Financial Services, Inc., referred to in the “Declaration of Eric Gillenwater on behalf of WorldCom, Inc.,” which is included as Attachment C to the Direct Testimony of Karen K. Furbish.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,

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Barbara Anne Sousa  
185 Franklin Street, Room 1403  
Boston, Massachusetts 02110-1585  
(617) 743-7331

Dated: February 8, 2002